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March 2, 2017

Honorable Judge William H. Pauley III  
Daniel Patrick Moynihan United States Courthouse  
United States District Court – Southern District of New York  
500 Pearl Street, Courtroom 20B  
New York, New York 10007-1312

Re: Case No. 1:17-cv-01266-WHP;  
*Eddystone Rail Company, LLC v. Jamex Transfer Services, LLC*

Dear Judge Pauley:

I represent non-parties Julio Rios and Jeremy Gamboa (together, the “Ferrellgas Officers”) and write pursuant to Section III(A) of Your Honor’s Individual Practices to request a pre-motion conference respecting the Ferrellgas Officers’ motion to intervene in the above-referenced action pursuant to FEDERAL RULES OF CIVIL PROCEDURE 24(a) and 24(b), in opposition to the relief sought by Petitioner Eddystone Rail Company, LLC (“Eddystone”). I write also to join Bridger Logistics, LLC, Ferrellgas Partners, L.P., and Ferrellgas L.P.’s (collectively, the “Bridger Parties”) February 28, 2017 letter to Your Honor [Docket No. 9] respectfully requesting that Your Honor permit us to participate in the conference scheduled for April 3, 2017.

For purposes of intervening and objecting to relief sought by Eddystone, the Ferrellgas Officers assert the same arguments as the Bridger Parties, and intend to coordinate with the Bridger Parties with regard to any necessary briefing, discovery, or other related matters in order to promote efficiencies and to avoid any duplicative effort on behalf of the parties.

The Ferrellgas Officers were not parties to the Arbitration and are not party to the Settlement Agreement. However, Petitioner is seeking to enforce the Alleged Arbitration Award against the Ferrellgas Officers through its February 2, 2017 complaint against the Bridger Parties and the Ferrellgas Officers in the United States District Court for the Eastern District of Pennsylvania. *See Eddystone Rail Company, LLC v. Bridger Logistics LLC, et al.*, Case No. 2:17-cv-00495-RK (E.D. Pa.) (the “Pennsylvania Action”). A copy of the Complaint in the Pennsylvania Action is attached. Eddystone alleges in its Complaint that JTS is insolvent and unable to satisfy the Alleged Arbitration Award, and seeks to hold each of the Ferrellgas Officers and the Bridger Parties liable for “all amounts awarded” by the arbitration panel to Eddystone. Eddystone principally alleges alter ego liability, based on the fact that Bridger Logistics *formerly*

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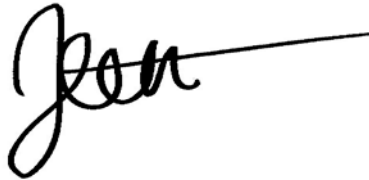
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owned JTS, *prior* to the breach giving rise to the arbitration (and thus prior to the arbitration itself), and the existence of a purported implied contract between Bridger Logistics and JTS to fund JTS's alleged capital needs.

Given that the Ferrellgas Officers and the Bridger Parties are identically situated with regard to intervention in this matter, we request that Your Honor permit the Ferrellgas Officers to intervene in the above referenced action in opposition to the relief sought by Eddystone. We will be available at the Court's convenience to discuss this matter and respectfully request that Your Honor permit us to participate in the conference scheduled for April 3, 2017.

Respectfully,

A handwritten signature in black ink, appearing to read "JAF", with a long horizontal line extending to the right.

Jeremy A. Fielding

JAF:jk

Encl.